

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

This Document Relates to All Actions

Oral Argument Requested

**NOTICE OF TEVA PHARMACEUTICALS USA, INC., TEVA
PHARMACEUTICAL INDUSTRIES LTD., ACTAVIS LLC, AND ACTAVIS
PHARMA, INC.’S MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that on February 5, 2024, or as soon thereafter as counsel may be heard, the undersigned counsel, on behalf of Teva Pharmaceuticals USA, Inc.; Teva Pharmaceuticals Industries Ltd.; Actavis LLC; and Actavis Pharma, Inc. (collectively “Teva Defendants”) shall move for entry of an Order granting summary judgment to the Teva Defendants on all claims designated in the Court’s Case Management Order No. [32](#) (the “TPP Trial Claims”), pursuant to Rule 56 of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that in support of their motion, the Teva Defendants shall rely upon their Motion for Summary Judgment (“Motion”) submitted herewith; the TPP Trial Defendants’ Omnibus Motion for Summary Judgment, filed contemporaneously with the Teva Defendants’ Motion and incorporated therein by reference; the TPP Trial Defendants’ Statement of Material

Facts Not in Dispute, together with exhibits, filed contemporaneously with the Teva Defendants' Motion and incorporated therein by reference; and any reply submissions made hereafter; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: December 22, 2023

Respectfully submitted,

By: /s/ Gregory E. Ostfeld

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USA, Inc., Teva Pharmaceutical
Industries Ltd., Actavis LLC, and*

Actavis Pharma, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 22, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Gerond J. Lawrence

Gerond J. Lawrence,
Greenberg Traurig, LLP